

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

PEARSON EDUCATION, INC., CENGAGE  
LEARNING, INC., and MCGRAW-HILL  
GLOBAL EDUCATION HOLDINGS, LLC

Plaintiffs,

v.

**Case No. 1:17-cv-203-DAB**

HELIOSBOOKS INC.; KOLYO HRISTOV;  
RAMAN KANDOLA; NICHOLAS LITTLE;  
HAMID KHAN; SHARMA RAJESH; YK  
SHARMA; BHAGWAT PRAKASH; BOOSTI,  
LLC; MY BOOK DRIVE, INC.; OLIVER W.  
CHEN; SIOW HONG CHANG; BLUE ROCKET  
BOOKS LTD.; DONALD BOONE; LUKE  
BROWN; FINE LINE MEDIA LLC; PRINCE  
JOHNSON; PRINCE SANCHEZ; MENG  
ZHANG; SITAPA RUJIKIETGUMJORN; WASIN  
RUJIKIETGUMJORN; MANUJ OBEROI;  
PATRICK MEDLEY; JAMES NELSON;  
ROGGER FARBER; FBAAZ, CORP.; DERICK  
RADFORD; JONATHAN HINDS; DILSHAD  
SAIFI; ANDREW BAILEY; SAMANTHA  
ANDERSON; and DOES 1-10,

Defendants.

**DECLARATION OF MICHAEL CANDORE**

I, MICHAEL CANDORE, hereby declare, pursuant to 28 U.S.C. § 1746, that the following statements are true and correct to the best of my personal knowledge and belief:

1. I am the Managing Director at BCGuardian, LLP (“BCGuardian”), which was retained by Plaintiffs Pearson Education, Inc. (“Pearson”), Cengage Learning, Inc. (“Cengage”), and McGraw Hill, LLC, formerly McGraw-Hill Global Education Holdings, LLC<sup>1</sup> (“McGraw

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<sup>1</sup> On January 1, 2020, McGraw Hill LLC became the successor in interest to McGraw-Hill Global Education Holdings, LLC.

Hill”) (collectively, “Plaintiffs”) in this action.

2. I submit this declaration in support of Plaintiffs’ Inquest as to Defendants Hamid Khan, Sharma Rajesh, YK Sharma, Bhagwat Prakash, Boosti, LLC (“Boosti”), Oliver W. Chen, Siow Hong Chang, Meng Zhang, Manuj Oberoi, Patrick Medley, and Dilshad Saifi (collectively, the “Defendants”) in this case.

3. I have held my current position at BCGuardian since January 2019 and previously served as the Director of Operations at BCGuardian beginning in October 2016. My responsibilities at BCGuardian include working closely with Plaintiffs in connection with their anti-piracy programs. Among other things, I conduct anti-counterfeiting investigations and frequently inspect books to determine whether they are counterfeit.

#### **INSPECTION OF DEFENDANTS’ INVENTORY**

4. A team of personnel acting under my direction and supervision received and processed Defendants’ inventory of Plaintiffs’ textbooks shipped from Amazon.com, Inc.

5. Upon delivery, my team reviewed and applied a unique number to each book and made an initial determination as to whether the book was counterfeit. We maintained the processed books in our warehouse, and representatives from each Plaintiff traveled to our warehouse to inspect their respective textbooks to confirm whether the books were counterfeit.

6. Attached hereto as **Exhibit 1** is a chart identifying the final list of counterfeit books identified during this inspection.

I declare under penalty of perjury that the foregoing is true and correct.



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Michael Candore

Executed this 26th day of June, 2020 in Ocean City, Maryland.